

REMARKS/ARGUMENTS

Claims 1-27 are pending. A substitute specification is submitted to overcome minor informalities. No new matter has been introduced.

Claims 1-27 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Yanai et al. (US 5,544,347).

Claims 1-4

Applicants respectfully submit that independent claim 1 is novel and patentable over Yanai et al. because, for instance, Yanai et al. does not teach or suggest that, in response to a second write request issued to write data in the second storage area, the second storage control unit is configured to transfer the second write request to the first storage control unit. This feature is described in the specification, for instance, at paragraph [0037] and Fig. 18, path (c).

Yanai et al. discloses a secondary data, which is an identical copy of the primary data stored in a primary data storage system, in a secondary data storage system. Yanai et al. further discloses a bi-directional implementation (see col. 6, lines 52-65). In Yanai et al., the identical data is merely transmitted to the other data storage system. In the claimed invention, the second storage control unit, even when receiving a write request for a secondary volume, does not write data in the secondary volume in response to the write request, but transfers the write request to the first storage control unit.

For at least the foregoing reasons, claim 1 and claims 2-4 depending therefrom are novel and patentable over Yanai et al.

Claims 5-7

Applicants respectfully submit that independent claim 5 is novel and patentable over Yanai et al. because, for instance, Yanai et al. does not teach or suggest that the first storage control unit is configured, in response to a second write request issued to write data in the second storage area by the second host system, to receive the second write request prior to writing data associated with the second write request to the second storage area.

As discussed above, Yanai et al. merely discloses that the identical data is transmitted to the other data storage system.

For at least the foregoing reasons, claim 5 and claims 6-7 depending therefrom are novel and patentable over Yanai et al.

Claims 8-10

Applicants respectfully submit that independent claim 8 is novel and patentable over Yanai et al. because, for instance, Yanai et al. does not teach or suggest that the second storage control unit is configured, in response to a second write request issued to write data in the second storage area from the second host system, to transfer the second write request to the first storage system to write data associated with the second write request to the first storage area prior to writing the data associated with the second write request to the second storage area.

As discussed above, Yanai et al. merely discloses that the identical data is transmitted to the other data storage system.

For at least the foregoing reasons, claim 8 and claims 9-10 depending therefrom are novel and patentable over Yanai et al.

Claims 11-14

Applicants respectfully submit that independent claim 11 is novel and patentable over Yanai et al. because, for instance, Yanai et al. does not teach or suggest, in response to a second write request issued to write data in the second storage area, transferring the second write request from the second storage control unit to the first storage control unit prior to writing data associated with the second write request to the second storage area.

As discussed above, Yanai et al. merely discloses that the identical data is transmitted to the other data storage system.

For at least the foregoing reasons, claim 11 and claims 12-14 depending therefrom are novel and patentable over Yanai et al.

Claims 15-16

Applicants respectfully submit that independent claim 15 is novel and patentable over Yanai et al. because, for instance, Yanai et al. does not teach or suggest, in response to a second write request issued to write data in the second storage area by a second host system, receiving the second write request to write data associated with the second write request to the first storage area prior to writing the data associated with the second write request to the second storage area.

As discussed above, Yanai et al. merely discloses that the identical data is transmitted to the other data storage system.

For at least the foregoing reasons, claim 15 and claim 16 depending therefrom are novel and patentable over Yanai et al.

Claims 17-19

Applicants respectfully submit that independent claim 17 is novel and patentable over Yanai et al. because, for instance, Yanai et al. does not teach or suggest, in response to a second write request issued to write data in the second storage area from a second host system, transferring the second write request to the first storage control unit to write data associated with the second write request to the first storage area prior to writing the data associated with the second write request to the second storage area.

As discussed above, Yanai et al. merely discloses that the identical data is transmitted to the other data storage system.

For at least the foregoing reasons, claim 17 and claims 18-19 depending therefrom are novel and patentable over Yanai et al.

Claims 20-22

Applicants respectfully submit that independent claim 20 is novel and patentable over Yanai et al. because, for instance, Yanai et al. does not teach or suggest, a first path through which data is transferred between the first connection and the first storage area; a second path through which data is transferred between the first storage area and the second storage control unit; a third path through which data is transferred between the second

storage control unit and the second storage area; and a fourth path through which data is transferred between the second connection and the first storage control unit.

As discussed above, Yanai et al. merely discloses that the identical data is transmitted to the other data storage system. The data path is between the primary data storage system and the secondary data storage system.

For at least the foregoing reasons, claim 20 and claims 21-22 depending therefrom are novel and patentable over Yanai et al.

Claims 23-25

Applicants respectfully submit that independent claim 23 is novel and patentable over Yanai et al. because, for instance, Yanai et al. does not teach or suggest, a first path through which data is transferred between the first connection and the first storage area; a second path through which data is transferred between the first storage control unit and the second storage control unit; and a third path through which data is transferred between the second connection and the first storage control unit.

As discussed above, Yanai et al. merely discloses that the identical data is transmitted to the other data storage system. The data path is between the primary data storage system and the secondary data storage system.

For at least the foregoing reasons, claim 23 and claims 24-25 depending therefrom are novel and patentable over Yanai et al.

Claims 26-27

Applicants respectfully submit that independent claim 26 is novel and patentable over Yanai et al. because, for instance, Yanai et al. does not teach or suggest, a first path through which data is transferred between the second connection and the first storage control unit; and a second path through which data is transferred between the first storage control unit and the second storage control unit.

As discussed above, Yanai et al. merely discloses that the identical data is transmitted to the other data storage system. The data path is between the primary data storage system and the secondary data storage system.

Appl. No. 10/626,454
Amdt. dated January 3, 2006
Reply to Office Action of October 3, 2005

PATENT

For at least the foregoing reasons, claim 26 and claim 27 depending therefrom are novel and patentable over Yanai et al.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 650-326-2400.

Respectfully submitted,



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